

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	MDL No. 2875 HON. ROBERT B. KUGLER
THIS DOCUMENT RELATES TO ALL CASES	

AMENDED NOTICE TO TAKE VIDEOTAPED ORAL DEPOSITION

**TO: Eric Abraham, Esq.
Hill Wallack LLP
21 Roszel Road
Princeton, New Jersey 08540**

Attorneys for Defendants Hetero Labs Limited and Hetero Drugs, Limited (hereinafter "Defendants").

Please take notice that pursuant to Federal Rule of Civil Procedure 30, and other applicable Rules, including the Local Civil Rules, and the applicable Orders of the Court, Plaintiffs, by and through their counsel, will take the videotaped deposition of Dr. Sreedhara Chaganty, on June 17, 2021, at 9:00 a.m. eastern standard time, and continuing until completion, at Hill Wallack LLP, 21 Roszel Road, Princeton, New Jersey 08540, via zoom, in accordance with the Fact Witness Deposition Protocol, Case Management Order #20, filed November 17, 2020 (Document 632). The deposition shall first address the Federal Rule of Civil Procedure 30(b)(6) topics listed on Exhibit A attached hereto, followed by deposition of the witness in his individual capacity. The witness shall produce the documents requested at Exhibit B, attached hereto, at least five days in advance of the deposition.

Pursuant to the meet and confer between the parties, a translator will not be provided.

TAKING ATTORNEYS FOR PLAINTIFFS:

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The videotaped deposition will be taken before a person authorized by law to administer oaths, pursuant to Rule 28 of the Federal Rules of Civil Procedure.

Dated: June 16, 2021

By: /s/ Andrés Rivero
ANDRÉS RIVERO
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*Counsel for MSP Recovery Claims,
Series LLC*

EXHIBIT A

30(B)(6) TOPICS

Nitrosamine Contamination

5. The genotoxic analysis performed by HLL on 4-Bromomethyl-2'cyano biphenyl in response to the FDA's inquiry as part of the Drug Master File submission.

Testing

7. The testing performed by any entity or person other than HLL or its agents but known to HLL, to evaluate the purity and contents of HLL's valsartan API.
8. The testing performed by HLL or its agents, to evaluate the purity and contents of HLL's finished dose.
11. The chromatogram and mass spectrometry results for all testing by any entity or person other than HLL or its agents but known to HLL, of HLL's valsartan API.
13. The chromatogram and mass spectrometry or other results for all testing by any entity or person other than HLL or its agents but known to HLL, of HLL's finished dose.
17. The chromatogram and mass spectrometry results for all testing by any entity or person other than HLL or its agents but known to HLL, of the solvents utilized in the manufacture of HLL's API.
54. The person most knowledgeable about the preparation of in-house nitrosamine impurities as summarized on the document with bates number HLL200638, including but not limited to the meaning of the "record issue date" column on that document, and documents (e.g. lab notebook(s), e-mails, etc.) reflecting such record issue date.

EXHIBIT B

DOCUMENT REQUESTS

1. The most recent resume/Curriculum Vitae and LinkedIn profile for Dr. Sreedhara Chaganty.
2. The complete production of Dr. Sreedhara Chaganty relevant custodial documents, including those maintained on personal computers or electronic devices, to the extent not produced prior.

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CERTIFICATE OF SERVICE

I hereby certify that on June 16, 2021, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

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